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Order Filed on July 12, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

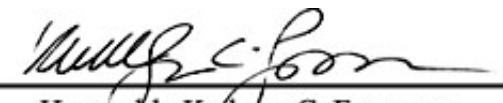
In re:	Chapter 11
Salvatore Marzella,	Case No. 20-24073-KCF
	Hearing Date: July 8, 2021 at 2:00 PM
Debtor.	Judge: Kathryn C. Ferguson

**CONSENT ORDER RESOLVING PLAN OBJECTION AND OUTLINING THE
TREATMENT OF SECURED CREDITOR**

The relief set forth on the following pages, number two (2) through three (3) is hereby

ORDERED

DATED: July 12, 2021



Honorable Kathryn C. Ferguson
United States Bankruptcy Judge

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Debtors:
Case No.:
Caption of Order:

Salvatore Marzella

20-24073-KCF

**CONSENT ORDER RESOLVING PLAN OBJECTION AND
OUTLINING THE TREATMENT OF SECURED
CREDITOR**

The undersigned parties resolved JPMorgan Chase Bank, National Association's ("Secured Creditor") Amended Objection to Plan Confirmation, [ECF No. 53] (the "Objection") and addressed Salvatore Marzella's ("Debtor") treatment of Secured Creditor's proof of claim, Claims Register #7, with respect to real property located at 191 Round Hill Drive, Freehold, New Jersey 07728 (the "Claim") through Debtor's Chapter 11 Plan,

WHEREAS, Debtor anticipates being offered and accepting a deferment of missed mortgage payments ("Deferment") from Secured Creditor which would address arrears due outside the plan; and

WHEREAS, it is anticipated that a Deferment would bring Debtor's account with Secured Creditor contractually current; and

WHEREAS, Debtor and Secured Creditor acknowledge that Secured Creditor is processing the Deferment request and Debtor's arrears have not yet been resolved; and

WHEREAS, until a Deferment is finalized, Debtor's arrears due to Secured Creditor have not been cured or addressed to completion and remain a delinquency on Debtor's account; and

WHEREAS, Secured Creditor anticipates providing a Deferment and receiving the executed agreement from Debtor but it reserves the right to pursue this unresolved default in the event the Deferment is not offered or not accepted by the Debtor; and

THEREFORE the parties have consented to the entry of the within Order, and for good cause shown;

ORDERED AS FOLLOWS:

1. The Objection is hereby resolved by this order.
2. Secured Creditor shall be entitled to file a Certification of Default to address amounts set for in the Claim in the event that a Deferment is not finalized forty-

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Debtor:

Salvatore Marzella

Case No.:

20-24073-KCF

Caption of Order:

**CONSENT ORDER RESOLVING PLAN OBJECTION AND
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CREDITOR**

five (45) days of confirmation regardless of which party's activity resulted in the incomplete status of a Deferment.

3. Secured Creditor may file an amended proof of claim to reflect the terms of the Deferment, should it be offered and accepted.
4. In the event the instant Chapter 11 bankruptcy case is dismissed or converted to another chapter under the bankruptcy code prior to finalized Deferment, the terms of the note and mortgage shall govern.

Consent to Form and Entry

McCalla Raymer Leibert Pierce, LLC
Attorney for the Secured Creditor

By:

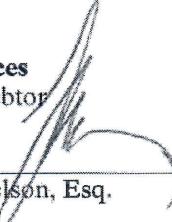

Phillip A. Raymond, Esq.

Date:


7.7.2021

Abelson Law Offices
Attorney for the Debtor

By:


Steven J. Abelson, Esq.

Date: